

**L.B.F. 9014-3**

**UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

**In Re:** : **Chapter 13**  
**AMANDA K. JOAS,** : **Case No. 19-14896**  
**a/k/a AMANDA KATHERINE JOAS,** : **Motion to Modify Confirmed Plan**  
**a/k/a AMANDA JOAS,** : **Hearing Date:**  
**Debtor(s)** : **June 23, 2022, 10:00 a.m.**  
: **United States Bankruptcy Court**  
: **Eastern District of Pennsylvania**  
: **The Gateway Building**  
: **201 Penn Street, Suite 103**  
: **Reading, PA 19601**

**NOTICE OF MOTION, RESPONSE DEADLINE AND HEARING DATE**

Debtor, **AMANDA K. JOAS** has filed a Motion to Modify Confirmed Plan seeking to make a proposed Fifth Amended Chapter 13 Plan the Confirmed plan, as Modified, in order to cure Chapter 13 Plan arrears due to COVID related temporary loss of income.

1. **Your rights may be affected.** You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. (If you do not have an attorney, you may wish to consult an attorney).
2. **If you do not want the court to grant the relief sought in the Motion** or if you want the court to consider your views on the Motion, then on or before **June 9, 2022** you or **your attorney must file a response to the Motion.** (*see Instructions on next page*).
3. **A hearing on the Motion** is scheduled to held on **June 23, 2022, at 10:00 A.M. in the Fourth Floor Courtroom, United States Bankruptcy Court, 201 Penn Street, Suite 103, Reading, PA 19601.**
4. **If you do not file a response to the Motion,** the court may cancel the hearing and enter an order granting the relief requested in the Motion.
5. You may contact the Bankruptcy Clerk's office for Philadelphia cases at (215) 408-2800 and for Reading cases at (610) 208-5040 to find out whether the hearing has been canceled because no one filed a response.

6. If a copy of the Motion is not enclosed, a copy of the Motion will be provided to you if you request a copy from the attorney whose name and address is listed on the next page of this Notice.

**Filing Instructions**

7. **If you are required to file documents electronically by Local Bankruptcy Rule 5005-1,** you must file your response electronically.
8. **If you are not required to file electronically,** you must file your response at  
  
United States Bankruptcy Court  
Eastern District of Pennsylvania  
The Gateway Building  
201 Penn Street, Suite 103  
Reading, PA 19601
9. **If you mail your response** to the bankruptcy clerk's office for filing, you must mail it early enough so that it will be received on or before the date stated in Paragraph 2 on the previous page of this Notice. **(June 9, 2022)**
10. On the same day that you file or mail your Response to the Motion, you must mail or deliver a copy of the Response to the movant's attorney:

Vincent Rubino, Esq.  
Newman Williams Law Office  
712 Monroe Street  
PO Box 511  
Stroudsburg, PA 18360  
Phone: (570) 421-9090  
Fax: (570) 424-9739  
[vrubino@newmanwilliams.com](mailto:vrubino@newmanwilliams.com)

Date: May 19, 2022

/s/ Robert J. Kidwell  
Robert J. Kidwell, Esquire  
Newman Williams, P.C.  
712 Monroe Street  
PO Box 511  
Stroudsburg, PA 18360  
Phone: (570) 421-9090  
Fax: (570) 424-9739  
[rkidwell@newmanwilliams.com](mailto:rkidwell@newmanwilliams.com)